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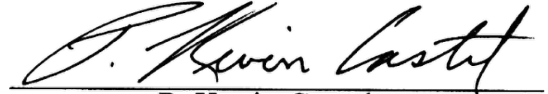
Bail is modified to permit travel to the NDNY
subject to the restriction in the penultimate
paragraph.

SO ORDERED.

Dated: 5/19/2021

BY ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007


P. Kevin Castel
United States District Judge

Re: United States v. Rene Allard, S4 20 Cr. 163 (PKC)

Dear Judge Castel:


We respectfully write on behalf of defendant Rene Allard to request a modification of the travel restrictions that are part of his bail conditions. We have conferred with the Government and they consent to this request.

Mr. Allard's travel is currently restricted to the Southern District of New York, the Eastern District of New York, the Middle District of Pennsylvania, the Southern District of Florida, and points in between those districts for purposes of travel only. We respectfully request that these restrictions be modified to allow Mr. Allard to also travel to the Northern District of New York. Mr. Allard's partner and children, with whom he resides, are spending time in the Northern District of New York over the course of the next several months, and the purpose of this request is to allow Mr. Allard to accompany them there.

SO ORDERED [The Government has conditioned its consent on Mr. Allard's not training or facilitating the training of racehorses while he is in the Northern District of New York, and not visiting any training facilities or racetracks while he is in the Northern District of New York. Mr. Allard has agreed to these conditions with respect to his activities in the Northern District of New York.]

Thank you for your consideration of this request.

Respectfully submitted,


Max Nicholas
Attorney for Rene Allard